

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION No.: 03 CV 12573 EFH

BERNADINE T. GRIFFITH
Plaintiff

vs.

ONEBEACON INSURANCE COMPANY,
ONEBEACON AMERICA INSURANCE
COMPANY, MICHAEL A. SISTO, and
KAREN ALLEN HOLMES
Defendants

DEPOSITION SUBPOENA
DUCES TECUM

To: William Queenan, Director of Human Resources
One Beacon Insurance
One Beacon Street
Boston, MA 02108

YOU ARE HEREBY COMMANDED, in the name of the Federal District Court of Massachusetts in accordance with the provisions of Rules 26, 30, and 34 of the Federal Rules of Civil Procedure, to appear and testify on behalf of Plaintiff, Bernadine T. Griffith, before a Notary Public in and for the Federal District of Massachusetts, or before some other officer authorized by law to administer oaths, commencing at 10:00 AM on Monday, August 23, 2004, at the Law Office of Kathleen J. Hill, 92 State Street, Suite 700, Boston, MA 02109, 617.742.0457, and there to testify as to your knowledge at the taking of the deposition in the above-entitled action.

And you are further required to bring with you:

1. Complainant, Bernadine T. Griffith's, entire personnel file, please include all correspondences in regards to Complainant and Complainant's medical condition.
2. All requests for accommodations that the Complainant made during her tenure and all responsive documentation pertaining to all accommodations that have either been granted or denied.

3. A list identifying all other employees, who like the Complainant have requested an accommodation due to a disability and received accommodations for their disability.
4. All documentation pertaining to Complainant's grievances and accusations that she was discriminated against due to her disability, to include documentation identifying the investigators position with Defendants, date of accusations, date of investigation, and his/her findings.
5. All copies of any and all medical records of the Complainant, including correspondence, notes, and letters written by any medical care provider pertaining to the Complainant.
6. All copies of any and all documentation, correspondence, emails, letters, memorandum, pay roll records or other records pertaining to any and all benefits pertaining to the employment of the Complainant, including her retirement, short-term/long-term disability, medical coverage, dental coverage, family medical leave, vacation, bonuses or any other benefit.
7. All copies of any and all documentation, correspondence, emails, letters, memorandum, pay roll records, or other records pertaining to any and all income the Complainant received from the Defendants.
8. All copies of all other documentation and records not otherwise requested above, as kept and maintained by the Defendants, pertaining to the Complainant in the course of her employment and her claims of discrimination that are the subject matter of this litigation.

HEREOR FAIL NOT, as you will answer your default under the pains and penalties in the law in that behalf made and provided.

Dated at Boston, this twenty-eighth day of July, A.D. 2004.

Notary Public – Craig La Clair
My Commission Expires on: May 21, 2010